

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

WISE MEDIA, LLC, a limited liability  
company,

BRIAN M. BUCKLEY, individually  
and as an officer of WISE MEDIA,  
LLC, and

WINSTON J. DELONEY, individually  
and as a member of WISE MEDIA,  
LLC,

Defendants, and

CONCRETE MARKETING  
RESEARCH, LLC, a limited liability  
company,

Relief Defendant.

**Case No. 1:13-cv-1234-WSD**

**STIPULATED ORDER FOR PERMANENT INJUNCTION AND  
MONETARY JUDGMENT AGAINST DEFENDANTS BRIAN M.  
BUCKLEY AND WISE MEDIA, LLC**

Plaintiff, the Federal Trade Commission (“Commission” or “FTC”), filed its  
Complaint for Permanent Injunction and Other Equitable Relief (“Complaint”), for

a permanent injunction and other equitable relief in this matter, pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b). The Commission and Defendants Wise Media, LLC and Brian M. Buckley (“Defendants”) stipulate to the entry of this Stipulated Order for Permanent Injunction and Monetary Judgment (“Order”) to resolve all matters in dispute in this action between them.

THEREFORE, IT IS ORDERED as follows:

#### **FINDINGS**

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendants participated in deceptive and unfair acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, by placing unauthorized charges on consumers’ mobile phone bills in a practice known as “cramming.”
3. Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, Defendants admit the facts necessary to establish jurisdiction.
4. Defendants waive any claim that they may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agree to bear their own costs and attorney fees.

Defendants further waive and release any claims that they may have against the Commission, the Receiver Katie Goodman of the law firm of GGG Partners, LLC (Katie Goodman and GGG Partners, LLC are referred to hereafter as the “Receiver”),<sup>1</sup> and their agents that relate to this action.

5. Defendants waive all rights to appeal or otherwise challenge or contest the validity of this Order.

### DEFINITIONS

For the purpose of this Order, the following definitions apply:

1. “**Asset Freeze Order**” means the Stipulated Supplemental Preliminary Injunction Regarding Asset Freeze, entered April 29, 2013.
2. “**Corporate Defendant**” means Wise Media, LLC, and its successors and assigns.
3. “**Defendants**” means Brian M. Buckley and Wise Media, LLC, individually, collectively, or in any combination.
4. “**Individual Defendant**” means Brian M. Buckley.
5. “**Partial Preliminary Injunction Order**” means the Stipulated Temporary Restraining Order with Asset Freeze and Order to Show Cause Why

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<sup>1</sup> The Court appointed Katie Goodman and the law firm of GGG Partners, LLC, as the Receiver in this action in its Order dated April 22, 2013.

Preliminary Injunction Should Not Issue, and Partial Preliminary Injunction With Receivership and Other Equitable Relief, entered April 19, 2013.

6. “**Person**” means any individual, group, unincorporated association, limited or general partnership, corporation, or other business entity.

7. “**Tangible Assets**” means the following:

- a. 2012 Jeep Wrangler Sport;
- b. 2012 Land Rover Evoque;
- c. 1994 Harley FLSTN NSTL;
- d. 2009 Mercedes Benz 4 door;
- e. 2011 Ferrari California;
- f. TAG Heuer watch;
- g. 110,000 shares of stock in Kiz Studios, Inc.; and
- h. All assets in safe deposit box #151 at SunTrust Bank, located at  
3353 Peachtree Road NE, Suite #12, Atlanta, GA 30326.

## **ORDER**

### **I. BAN ON PLACING CHARGES ON TELEPHONE BILLS**

IT IS ORDERED that Defendants are permanently restrained and enjoined from placing charges on any person’s telephone bill, whether directly or through an intermediary, including by providing any advertising, marketing, financial, or

technical assistance to other persons to place charges on any person's telephone bill.

**II. PROHIBITION AGAINST BILLING WITHOUT AUTHORIZATION**

IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, are permanently restrained and enjoined from (a) representing or assisting others in representing, expressly or by implication, that a consumer is obligated to pay any charge for goods or services, or (b) causing or assisting others in causing any charge to be billed to a consumer's account, unless:

- A. All material terms of the offer for which the charge is billed, including the number and amount of each charge and the account to which the each charge will be billed, have been disclosed prior to the placement of the charge; and
- B. The consumer previously provided express verifiable agreement to be charged.

**III. MONETARY JUDGMENT**

IT IS FURTHER ORDERED that:

A. Judgment in the amount of Ten Million, Nine Hundred Sixty Five Thousand, Six Hundred and Thirty-Eight Dollars (\$10,965,638) is entered in favor of the Commission against Defendants, jointly and severally.

B. Defendants are ordered to pay to the Commission as follows:

1. The amounts held in escrow controlled by the Receiver that constitute the “Buckley Expense Escrow” defined in Section II of the Asset Freeze Order, consisting of all funds in the Bank of North Georgia account xxxxxx7406 (“the Receivership Escrow”). Within seven (7) days of entry of this Order, the Receiver must surrender to the Commission all control, title, dominion, and interest in assets held in the Receivership Escrow. All funds shall be transferred in accordance with instructions previously provided by a representative of the Commission.
2. The amounts held in cash or bank accounts frozen pursuant the Asset Freeze Order. Effective upon the entry of this Order, Defendants must surrender to the Commission all control, title, dominion, and interest in the following assets (collectively, the “Frozen Assets”):

- a. The “Frozen Assets” shall include \$380 in cash held by Individual Defendant, \$100,000 from the Wells Fargo bank account xxxxxx3723 held by Changus Campbell, LLP, and all funds in the following accounts:
  - i. JP Morgan Chase account xxxxx5020 (Netvertising Network, LLC);
  - ii. JP Morgan Chase account xxxxx3670 (Netvertising Network LLC);
  - iii. JP Morgan Chase account xxxxx3580 (Foundation Research LLC);
  - iv. JP Morgan Chase account xxxxx3100 (Netforce Staffing LLC);
  - v. JP Morgan Chase account xxxxx7700 (Beckava LLC);
  - vi. JP Morgan Chase account xxxxx7500 (Red Rope Group LLC);
  - vii. JP Morgan Chase account xxxxx0260 (Mach 1 Marketing LLC);

- viii. JP Morgan Chase account xxxxx0080 (Brian M. Buckley);
- ix. JP Morgan Chase account xxxxx1790 (Art of Media LLC);
- x. SunTrust Bank account xxxxxxxxx9980 (Burn Notice LLC);
- xi. SunTrust Bank account xxxxxxxxx7362 (Winley Marketing LLC);
- xii. SunTrust Bank account xxxxxxxxx8204 (Netvertising Network LLC);
- xiii. SunTrust Bank account xxxxxxxxx5342 (Wise Media, LLC);
- xiv. SunTrust Bank account xxxxxxxxx8824 (Foundation Research LLC);
- xv. SunTrust Bank account xxxxxxxxx9972 (Red Rope Group LLC);
- xvi. SunTrust Bank account xxxxxxxxx8790 (Mach 1 Marketing LLC);

- xvii. SunTrust Bank account xxxxxxxxx8808 (Notice Marketing Company LLC);
- xviii. SunTrust Bank account xxxxxxxxx7274 (Brian M. Buckley);
- ixx. SunTrust Bank account xxxxxxxxx7888 (Art of Media LLC);
- xx. Verity Bank account xxx6372 (Art of Media LLC);  
and
- xxi. Belize Bank International account xxxxxxxx5513 (SMFL LLC);

b. To effect the surrender of the Frozen Assets, the Court directs that the entities holding the funds or their successors shall, immediately upon receiving notice of this Order, remit the funds to the Commission by certified check(s) or other guaranteed funds payable to the Federal Trade Commission, Financial Management Office, or by wire transfer in accordance with directions provided by counsel for the Commission. To the extent any identified third party cannot comply with this

Subsection without the assistance of Defendants, such party must, within three (3) business days of receiving this Order, notify such Defendant(s) and counsel for the Commission of its inability to comply. Such notification shall specify the actions by such Defendant(s) that are necessary to comply with this Order. Defendants shall immediately complete any action necessary to facilitate the identified third party's ability to timely comply with this Subsection, and the failure of such Defendant(s) to complete such action within ten (10) days shall be deemed a violation of the Order and interest at the rate prescribed in 28 U.S.C. § 1961 shall immediately begin to accrue.

C. Within sixty (60) days following entry of this Order, the Receiver shall make a good faith effort to sell or liquidate, for fair market value, any assets of the Receivership that the Receiver obtained pursuant to the Partial Preliminary Injunction Order, and shall file any request for reasonable compensation pursuant to Section XIII of the Partial Preliminary Injunction Order that is to be paid out of the assets of the Receivership. Within 7 days of the sale or liquidation of all such

assets or the Court's disposition of such a request, whichever is later, the Receiver shall remit the proceeds from the sale and all remaining funds from the Receivership to the Commission by electronic fund transfer in accordance with instructions previously provided by a representative of the Commission.

D. Effective upon the entry of this Order, Defendants must surrender to the Receiver all control, title, dominion, and interest in the Tangible Assets. Within sixty (60) days following entry of this Order, the Receiver must sell all the Tangible Assets at fair market value, and file any request for reasonable compensation pursuant to Section XIII of the Partial Preliminary Injunction Order that is to be paid out of the proceeds of the sale of the Tangible Assets. Within seven (7) business days of the sale of all Tangible Assets or the Court's disposition of such a request for reasonable compensation, whichever is later, the Receiver shall remit the remaining proceeds of the sale to the Commission by electronic fund transfer in accordance with instructions previously provided by a representative of the Commission.

E. Upon the completion of all of the Defendants' obligations under Sections III.B, III.C, and III.D above, including all payments and asset transfers, the remainder of the judgment is suspended, subject to Subsections F, G, and H below.

F. The Commission's agreement to the suspension of part of the judgment is expressly premised upon the truthfulness, accuracy, and completeness of Defendants' sworn financial statements and related documents (collectively, "financial representations") submitted to the Commission, namely:

1. the Financial Statement of Brian M. Buckley signed on April 24, 2013, including the attachments;
2. the Financial Statement of Corporate Defendant Wise Media, LLC signed by Brian M. Buckley on April 24, 2013, including the attachments; and
3. the Supplemental Financial Statement signed by Brian M. Buckley on August 8, 2013.

G. The suspension of the judgment will be lifted as to any Defendant if, upon motion by the Commission, the Court finds that the Defendant failed to disclose any material asset, materially misstated the value of any asset, or made any other material misstatement or omission in the financial representations identified above.

H. If the suspension of the judgment is lifted, the judgment becomes immediately due as to that Defendant in the amount specified in Subsection A above (which the parties stipulate only for purposes of this Section represents the

consumer injury in the Complaint), less any payment previously made pursuant to this Section, plus interest computed from the date of entry of this Order.

#### **IV. ADDITIONAL MONETARY PROVISIONS**

IT IS FURTHER ORDERED that:

A. Defendants relinquish dominion and all legal and equitable right, title, and interest in all assets transferred pursuant to this Order and may not seek the return of any assets.

B. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of the Commission, including in a proceeding to enforce its rights to any payment or monetary judgment pursuant to this Order, such as a nondischargeability complaint in any bankruptcy case.

C. The facts alleged in the Complaint establish all elements necessary to sustain an action by the Commission pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and this Order will have collateral estoppel effect for such purposes.

D. Defendants acknowledge that their Taxpayer Identification Numbers (Social Security Numbers or Employer Identification Numbers), which Defendants previously submitted to the Commission, may be used for collecting and reporting

on any delinquent amount arising out of this Order, in accordance with 31 U.S.C. §7701.

E. All money paid to the Commission pursuant to this Order may be deposited into a fund administered by the Commission or its designee to be used for equitable relief, including consumer redress and any attendant expenses for the administration of any redress fund. If a representative of the Commission decides that direct redress to consumers is wholly or partially impracticable or money remains after redress is completed, the Commission may apply any remaining money for such other equitable relief (including consumer information remedies) as it determines to be reasonably related to Defendants' practices alleged in the Complaint. Any money not used for such equitable relief is to be deposited to the U.S. Treasury as disgorgement. Defendants have no right to challenge any actions the Commission or its representatives may take pursuant to this Subsection.

**V. MODIFICATION OF ASSET FREEZE.**

IT IS FURTHER ORDERED THAT the asset freeze provisions of Sections I, II, and III of the Asset Freeze Order are hereby modified as follows:

A. The Receiver is permitted to transfer any funds held in a Receivership Escrow to the Commission, as directed in Section III.B.1.

B. The entities holding the Frozen Assets identified in Section III.B.2, or their successors, shall be permitted to transfer those funds to the Commission, as directed in Sections III.B.2.

C. Defendants are permitted to transfer Tangible Assets to the Receiver, as directed in Section III.D.

D. Upon the completion of all of the Defendants' obligations under Sections III.B, III.C, and III.D above, including all payments and asset transfers, Sections I, II, and III of the Asset Freeze Order shall no longer be in effect as to Defendants.

## **VI. CUSTOMER INFORMATION**

IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, are permanently restrained and enjoined from directly or indirectly:

A. failing to provide sufficient customer information to enable the Commission to efficiently administer consumer redress. Defendants represent that they have provided this redress information to the Commission. If a representative of the Commission requests in writing any information related to redress,

Defendants must provide it, in the form prescribed by the Commission, within 14 days;

B. disclosing, using, or benefitting from customer information, including the name, address, telephone number, email address, social security number, other identifying information, or any data that enables access to a customer's account (including a credit card, bank account, telephone company account, or other financial account), that any Defendant obtained prior to entry of this Order in connection with the placement of charges on consumers' phone bills; and

C. failing to destroy such customer information in all forms in their possession, custody, or control within 30 days after receipt of written direction to do so from a representative of the Commission.

*Provided, however,* that customer information need not be disposed of, and may be disclosed, to the extent requested by a government agency or required by law, regulation, or court order.

## **VII. COOPERATION**

IT IS FURTHER ORDERED that Defendants must fully cooperate with representatives of the Commission and the Receiver in any investigation or proceeding related to or associated with the transactions or the occurrences that are the subject of the Complaint. Defendants must provide truthful and complete

information, evidence, and testimony. Individual Defendant must appear and Corporate Defendant must cause its officers, employees, representatives, or agents to appear for interviews, discovery, hearings, trials, and any other proceedings that a Commission representative or the Receiver may reasonably request upon 5 days written notice, or other reasonable notice, at such places and times as a Commission representative or the Receiver may designate, without the service of a subpoena.

#### **VIII. OTHER ACTIONS BY THE RECEIVER.**

IT IS FURTHER ORDERED that:

A. Within fourteen (14) days of entry of this Order, the Receiver shall file a report with the Court stating what action(s), if any, the Receiver intends to take in regard to any assets owed to the Corporate Defendant that are in the possession of third parties. If the Receiver intends to file any legal action to recover such assets belonging to the Corporate Defendant, any such action must be filed within 30 days of entry of this Order. Any assets recovered by the Receiver must be paid to the Commission within 21 days of the Receiver obtaining possession of the assets; *provided, however*, that if the Receiver requests payment for reasonable compensation pursuant to Section XIII of the Partial Preliminary Injunction Order within 21 days of taking possession of an asset, the Receiver may

retain possession of assets in the amount of the requested compensation until such time as the Court resolves the request for payment. The Receiver must complete any duties taken pursuant to this subsection A within thirty (30) days of the later of: (a) the date on which all assets are recovered, (b) if not all assets are recovered, the date of final disposition of any legal action to recover assets, or (c) the date of Court's disposition of a request for reasonable compensation from the recovered assets.

B. The Receiver may file a motion with the Court to dissolve the Corporate Defendant, *provided that* notice is given to all parties no more than five (5) days prior to such filing.

C. Other than any action taken pursuant to subsection A in this section or pursuant to Section III, the Receiver must complete all remaining actions in regard to the Receivership within 120 days after entry of this Order. *Provided, however,* that any party or the Receiver may request that the Court extend that Receiver's term for good cause.

#### **IX. ORDER ACKNOWLEDGMENTS**

IT IS FURTHER ORDERED that Defendants obtain acknowledgments of receipt of this Order:

A. Each Defendant, within 7 days of entry of this Order, must submit to

the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

B. For 5 years after entry of this Order, Corporate Defendant and Individual Defendant, for any business that they individually or collectively with any other Defendants or with Winston J. DeLoney, are the majority owner or control directly or indirectly, must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees, agents, and representatives who participate in billing charges to consumers; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery must occur within 7 days of entry of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.

C. From each individual or entity to which a Defendant delivered a copy of this Order, that Defendant must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

#### **X. COMPLIANCE REPORTING**

IT IS FURTHER ORDERED that Defendants make timely submissions to the Commission:

A. One year after entry of this Order, each Defendant must submit a compliance report, sworn under penalty of perjury:

1. Each Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with Defendant; (b) identify all of that Defendant's businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of each business, including the goods and services offered, the means of advertising, marketing, billing, and sales, and the involvement of any other Defendant or Winston J. DeLoney (which Individual Defendant must describe if he knows or should know due to his own involvement); (d) describe in detail whether and how that Defendant is in compliance with each Section of this Order; and (e) provide a copy of each Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the Commission.

2. Additionally, Individual Defendant must: (a) identify all telephone numbers and all physical, postal, email and Internet addresses, including all residences; (b) identify all business activities, including any business for which Individual Defendant performs services whether as an employee or otherwise and any entity in which Individual Defendant has any ownership interest; and (c) describe in detail Individual Defendant's involvement in each such business, including title, role, responsibilities, participation, authority, control, and any ownership.

B. For 20 years after entry of this Order, each Defendant must submit a compliance notice, sworn under penalty of perjury, within 14 days of any change in the following:

1. Each Defendant must report any change in: (a) any designated point of contact; or (b) the structure of Corporate Defendant or any entity that Defendant has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including: creation, merger, sale, or dissolution of the entity or any subsidiary,

parent, or affiliate that engages in any acts or practices subject to this Order.

2. Additionally, the Individual Defendant must report any change in: (a) name, including aliases or fictitious name, or residence address; or (b) title or role in any business activity, including any business for which Individual Defendant performs services whether as an employee or otherwise and any entity in which Individual Defendant has any ownership interest, and identify the name, physical address, and any Internet address of the business or entity.

C. Each Defendant must submit to the Commission notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against such Defendant within 14 days of its filing.

D. Any submission to the Commission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: “I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on: \_\_\_\_\_” and supplying the date, signatory’s full name, title (if applicable), and signature.

E. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: FTC v. Wise Media, LLC.

#### **XI. RECORDKEEPING**

IT IS FURTHER ORDERED that Defendants must create certain records for 20 years after entry of the Order, and retain each such record for 5 years.

Specifically, Corporate Defendant and Individual Defendant for any business that such Defendant, individually or collectively with any other Defendants or Winston J. DeLoney, is a majority owner or controls directly or indirectly, must create and retain the following records:

A. accounting records showing the revenues from all goods or services sold and charges to consumers;

B. personnel records showing, for each person providing services, whether as an employee or otherwise, that person's: name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;

C. records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a third party, and any response;

D. all records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission; and

E. all records of any consumer's authorization to be billed or charged for any of Defendants' goods or services.

## **XII. COMPLIANCE MONITORING**

IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants' compliance with this Order, including the financial representations upon which part of the judgment was suspended and any failure to transfer any assets as required by this Order:

A. Within 14 days of receipt of a written request from a representative of the Commission, each Defendant must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents for inspection and copying. The Commission is also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

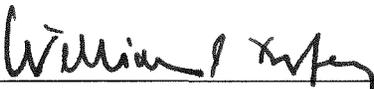
B. For matters concerning this Order, the Commission is authorized to communicate directly with each Defendant. Defendant must permit representatives of the Commission to interview any employee or other person affiliated with any Defendant who has agreed to such an interview. The person interviewed may have counsel present.

C. The Commission may use all other lawful means, including posing, through its representatives as consumers, suppliers, or other individuals or entities, to Defendants or any individual or entity affiliated with Defendants without the necessity of identification or prior notice. Nothing in this Order limits the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

### **XIII. RETENTION OF JURISDICTION**

IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

SO ORDERED this 21<sup>st</sup> day of November, 2013.

  
UNITED STATES DISTRICT JUDGE

**SO STIPULATED AND AGREED:**

**FOR PLAINTIFF:  
FEDERAL TRADE COMMISSION**

David C. Shonka  
Acting General Counsel

\_\_\_\_\_/s/\_\_\_\_\_  
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Dated: November 20, 2013

**FOR DEFENDANTS:**



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Date: 8-9-13

**DEFENDANT WISE MEDIA, LLC**



BRIAN M. BUCKLEY  
AS AN OFFICER OF WISE MEDIA, LLC

Date: 8-9-13

**DEFENDANT BRIAN M. BUCKLEY**



BRIAN M. BUCKLEY INDIVIDUALLY

Date: 8-9-13